

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE PULLMAN GROUP, LLC,

Plaintiff,

vs.

Civil Action No. 1:20-cv-07293-GHW

RONALD ISLEY, RUDOLPH ISLEY,  
RESERVOIR MEDIA MANAGEMENT,  
INC., THE ESTATE OF O'KELLY  
ISLEY, J.R., ISLEY BROTHERS, L.L.C.,  
ISLEY BROTHERS ROYALTY  
VENTURE I SPC, INC., THREE BOYS  
MUSIC CORPORATION, BOVINA  
MUSIC INC., T-NECK RECORDS, INC.,  
TRIPLE THREE MUSIC, INC. AND  
JOHN DOE CORPORATIONS 1-5,

Defendants.

**ISLEY DEFENDANTS' NOTICE OF MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

**(ORAL ARGUMENT REQUESTED)**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of their Motion to Dismiss Plaintiff's Complaint, and upon all pleadings and proceedings herein, Defendants Ronald Isley, Rudolph Isley, The Estate of O'Kelly Isley, Jr., Isley Brothers, L.L.C., Isley Brothers Royalty Venture I SPC, Inc., Three Boys Music Corporation, Bovina Music Inc., T-Neck Records, Inc., and Triple Three Music, Inc. (collectively, "Isley Defendants"), by and through their undersigned counsel, will move this Court, at a date and time to be determined by the Court, before the Honorable Gregory H. Woods, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for an Order dismissing Plaintiff's Complaint with prejudice, pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: October 28, 2020

Respectfully submitted,

WILLS LAW FIRM, PLLC

/s/ Rhonda H. Wills

Rhonda H. Wills

New York Bar No. 5373295

[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)

Wills Law Firm, PLLC

1776 Yorktown, Suite 570

Houston, Texas 77056

Telephone: (713) 528-4455

Facsimile: (713) 528-2047

ATTORNEY FOR ISLEY DEFENDANTS

**CERTIFICATE OF SERVICE**

I, the undersigned counsel, hereby certify that the foregoing document has been electronically filed with the clerk of the Court by using the CM/ECF system, which will in turn send a notice of the electronic filing to all counsel of record, on this 28th day of October, 2020.

/s/ Rhonda H. Wills

Rhonda H. Wills